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Regulating International Student Recruitment Agents: Lessons for Ontario

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Based on a project undertaken by
Higher Education Strategy
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Table of Contents

Research Questions and Methodology	6
Background on International Education Agents	7
The Ontario Context.....	9
Models of Agent Regulation in Other Countries	10
The United States	10
The United Kingdom	11
Australia	12
New Zealand.....	14
Conclusion	15
References.....	17
Appendix A: Canadian Approaches.....	Error! Bookmark not defined.
National Initiatives	22
Provincial Regulations.....	23
Government of Manitoba Guide to the Code of Practice and Conduct Regulation	23
British Columbia Ministry of Post-Secondary Education and Future Skills' Education Quality Assurance Code of Practice	24
Saskatchewan Ministry of Education's Agent Training Program	25
EduNova's Agent-training Program in Partnership with CBIE.....	26
Ontario Public Colleges' Standards of Practice for International Education.....	27



List of Tables

Table 1 *Australian Formula for Calculating Institutional and Country Evidence Levels* 13



International education agents play a key role in bringing students to Ontario from all over the world. Their efforts can support Canada in attracting and retaining the best and the brightest, ensuring our workforce needs are met and providing international students with the opportunity to build a new, prosperous life for themselves. However, the possibility of unethical behaviour by agents raises concerns about student protection and reputational risks. Immigration, Refugees and Citizenship Canada (IRCC) issues study permits to international students who show their ability to financially support themselves and willingness to return home if necessary. Until 2024, students at a Designated Learning Institution (DLI) were broadly eligible for a Post-Graduation Work Permit (PGWP), which allowed them work in Canada for up to three years and could support their transition to permanent residency.¹ These conditions set the stage for institutions to increase their recruitment of international learners.

Since 2024, IRCC has allocated each province a quota of international students that its institutions can recruit. To be included in this quota, each applicant for a study permit must be admitted by a college or university with DLI status and acquire a Provincial Attestation Letter (PAL). The current number of PALs in Ontario is well below the number of international students admitted in 2023. This mechanism gives the province the option to control each institution's international recruitment by redistributing PALs.

Much of the recent discourse around international students and immigration more broadly has been focused on controlling the numbers of new entrants into Canada, partly on the basis that extra residents increase pressure on Canada's housing stock (IRCC, 2024). Beyond the caps on PALs, there have also been other immigration reforms, such as increasing the required amount of financial support needed to enter the country and restricting access to PGWPs for students studying in certificate and diploma programs. IRCC's changes are a contributing factor in the dramatic decreases in international enrollment more recently. Concerns regarding unscrupulous recruitment activities are heightened in this environment as postsecondary institutions must ensure that international students have accurate information and see the value of studying at a Canadian institution. This issue is made more challenging as recruitment agents are unregulated and primarily operate outside of Canada.

¹ Entering Canada's immigration system after graduating from a Canadian institution was widely portrayed as an easier route than the alternatives.



Canada is far from the only jurisdiction that must grapple with these challenges. The United States (US), the United Kingdom (UK), Australia and New Zealand all have similar legal and constitutional backgrounds to Canada, as well as social and cultural similarities that shape approaches to immigration and international education. Looking at how each of these jurisdictions manages or regulates international student recruitment can provide valuable insights for Canada and Ontario as they consider future international student policy.

Research Questions and Methodology

Higher Education Strategy Associates (HESA) was commissioned by the Higher Education Quality Council of Ontario (HEQCO) as part of their consortium on international education to conduct a study that explores models for the regulation of international education recruitment agents in other international, national and subnational jurisdictions to determine if aspects of these models could be applied to international agents in Ontario.

HESA explored the following questions:

- How do Ontario stakeholders view international education agents?
- How do other countries define international agents? What national policies are in place to support ethical recruitment?

HESA employed a mixed-methods approach, combining a comprehensive literature review with qualitative interviews to assess models for regulating international agents in Ontario. The literature review examined open-source materials and published articles on the regulatory systems for international education agents in Canada and other countries. This review aimed to identify key trends, challenges and best practices in regulating the operations of education agents. Additionally, HESA analyzed key legislative and regulatory documents governing education agents in Canada and its major international competitors, including Australia, New Zealand, the UK and the US. These documents were selected to provide insights into the policies and legal frameworks that regulate the operations, recruitment practices and accountability of education agents in facilitating international student mobility.



To complement the literature review and gain insights into current practices, semi-structured interviews were conducted with a diverse set of stakeholders in three phases. In the first phase, interviews were held with Ontario-based stakeholders, including representatives from Colleges Ontario, Polytechnics Canada, Universities Canada and the Canadian Bureau for International Education (CBIE). The second phase involved discussions with both Canadian and international regulators and education agents, such as the Government of Manitoba, EduNova, World Education Services and ApplyBoard. Finally, in the third phase, interviews were conducted with regulators from other sectors in Ontario — specifically financial services providers and insurance brokers — to get a broader perspective on regulatory practices and governance models in the province.

Results from this research were used by the HEQCO team to inform this report.

Background on International Education Agents

Canada has been a leading destination for international education, with enrollment numbers increasing rapidly between 2010 and 2023 (Statistics Canada, 2021). Increases were particularly dramatic in Ontario. In 2023, Ontario accounted for 51% of the more than one million international students in Canada (International Consultants for Education and Fairs [ICEF], 2024).

Enrollment increases were linked to measures implemented by Canadian policymakers — federal and provincial — and by postsecondary institutions eager to increase their international student populations. The rapid internationalization of the postsecondary sector has been aided significantly by international education agents. These agents are individuals or organizations that act as intermediaries between educational institutions and prospective international students (EduCanada, 2024). Their roles typically include recruiting students, guiding them through the application process and sometimes providing post-enrollment support to study abroad. Some are large corporations that provide these services, but there are also many very small operators. An important nuance that emerged in this research was the difference between agents who advise students and agents who represent colleges and universities. Students can seek advice from agents who do not necessarily have the institution's endorsement. Unscrupulous actors operating as independent agents can potentially be a source of fraud and high



rejection rates for study permits. Turnover is high in this sector, with new agents entering and exiting the field and staff moving between different agencies. As such, the relationships between applicants, agents and institutions are complex.

International agents possess valuable knowledge and expertise about the education systems, admission requirements and immigration policies of various jurisdictions, allowing them to offer tailored guidance based on each applicant's unique profile and circumstances. This makes international education agents an invaluable resource for many students who wish to pursue education abroad. Postsecondary institutions also partner with agents to expand their recruitment efforts into regions where they lack a direct presence. Additionally, agents bring invaluable local market knowledge to the table. By leveraging the expertise and networks of agents, institutions can significantly increase their international student numbers, enhancing both their cultural diversity and financial stability.

As in any principal–agent relationship, financial motivations can generate behaviour that is damaging to the interests of the client/applicant, and the complex relationships at play make regulation difficult. For example, the custom of paying agents a proportion of each admitted student's first-year tuition gives agents a short-term incentive to place as many students as possible, even if they are not well prepared to succeed in Canada or an institution cannot guarantee a quality education for such high numbers. Since there are no standards to set fees, they can vary widely. HESA's consultations revealed that some agents can charge as much as \$10,000. "Double-dipping" (charging applicants a fee and charging institutions a commission) is widely considered inappropriate but is not actually banned.

Platforms have emerged that algorithmically match applicants, agents and institutions, with ApplyBoard the largest but not the only example in Canada. The term "aggregator," while commonly used to describe these platforms, is not necessarily accepted by the platforms themselves. They provide services in addition to simply connecting parties together, often including at least a basic level of verification of agents' backgrounds. They may also use software to complete the routine parts of applications after their partner agents have brought in applicants interested in working with them.



The Ontario Context

Over the past decade, international student recruitment at Ontario postsecondary institutions has brought rich cultural diversity to campuses while also offering valuable revenue streams to colleges and universities. But this rapid internationalization has also come with significant risks, as outlined in a 2021 report released by the Auditor General of Ontario (Office of the Auditor General of Ontario, 2021) that highlighted the increasing overreliance on international recruitment for revenue at publicly assisted colleges. These concerns were compounded by media reports highlighting examples of unethical practices in the recruitment of international students (Baksh et al., 2022; Bascaramurty, Bhatt, & Rana, 2023).

There is no specific provincial legislation or formal accreditation system in Ontario that regulates international education agents. This potentially creates space for agents to conduct unethical practices (Colbran, 2023) or share misinformation, such as making false promises (Packer, 2023) about easy pathways to permanent residency after graduation, steering students towards inappropriate programs or institutions regardless of their qualifications or career aspirations, providing misleading information about tuition fees and enrollment status (Hune-Brown, 2022) or encouraging financially struggling students to apply with unrealistic assurances about funding options. While the numbers of such cases are limited, stakeholders shared that they nonetheless have an outsized impact on the reputation of Ontario's postsecondary education system.

Oversight is often left to the individual educational institutions (there are more details of this in Appendix A). Conversations with various organizations underscored the critical need for vetting and training agents to ensure they adhere to a set of established standards. Currently, organizations in Ontario have their own standards and policies, such as requiring agents to be certified and mandating thorough Know Your Customer procedures, with penalties for non-compliance. However, a significant challenge is that these organizations operate in isolation. The absence of centralized regulatory bodies creates a "grey area" for agents who can exploit loopholes in the system. For example, a significant issue highlighted during consultations was that agents who had been identified and "blacklisted" in one province were often able to operate in others.

Standardized regulation and training programs for agents could streamline their efforts and help protect both international students and institutions against bad actors. This would require a more active role for government in the regulation of international



agents. Australia and New Zealand offer two compelling models for this type of government involvement.

Models of Agent Regulation in Other Countries

HESA explored three models of international education agent regulation in countries that are major recipients of international students and have broadly similar legal and constitutional backgrounds to Canada. These were the US, the UK, Australia and New Zealand.

The US is an example of self-regulation that works in a specific policy context, while there are elements of public regulation in the other three countries. The Australian, UK and New Zealand models set standards for the processes that institutions must put in place for their agents. However, in these jurisdictions, the ultimate sanction is tied to data about students' outcomes. It is important to note that student outcomes are dependent on a variety of factors, many of which have no direct relationship to an assisting international education agent.

None of the interviews uncovered methods by which other countries regulate advisory services that agents can offer to international students privately if they are outside their jurisdiction. All of the mechanisms discussed required that the agent in question be acting under the authorization of a college or university located in that country.

The United States

The US does not publicly regulate international agents. Colleges and universities can choose to exclusively work with agents who voluntarily pursue certification by the Association of International Enrollment Management (AIRC²) to protect their own reputations and be assured that the agents are reputable and trustworthy.

² Originally named the American International Recruitment Council, AIRC changed their name in September 2023 to AIRC: The Association of International Enrollment Management to reflect their expanded scope and the global nature of their members and stakeholders (Knott, 2023).



AIRC's process is rigorous, including a background check for past fraud or other criminality, an extended self-review, a site visit by external reviewers and confirmation that the agent has been recruiting students to US colleges or universities for at least two years (AIRC, 2023). AIRC is clear that if an agency engages in any form of subcontracting relationship, it remains accountable for the actions of sub-agents (AIRC, 2023a).

AIRC certification is valuable precisely because the process is laborious and time-consuming. However, the rigour of this process creates significant entry barriers. Agents must cover the costs of certification, which can be thousands of dollars, and the process takes months to complete.

Furthermore, there has not historically been a strong culture of leveraging student recruitment agents by US postsecondary institutions. As a result, combined with the entry barriers identified above, most agents that are used in the US fall outside of the AIRC certification process.

The United Kingdom

The UK system does not have a formal regulatory body for international agents, but both government and non-governmental actors play roles. The British Council offers training opportunities to agents, while the British Universities' International Liaison Association and the UK Council for International Student Affairs — which were created by universities and their personnel — work to develop related policy.

The British Council is a non-governmental organization largely funded by the government that has a mandate to increase the country's cultural influence. Since promoting international student mobility has historically been a key part of this, there is a strong interest in ensuring agents representing British universities are well informed and professional. The British Council operates a 'hub' for policy news that allows institutions and agents to keep up with regulatory changes.

In the early 2000s, the Council created a database of certified agents and counsellors who have passed some assessments and agreed to the British Council Code of Conduct (British Council, 2026). The Council does not accredit the agents on this list or test their procedures. It only certifies that they have passed tests that indicate knowledge of facts about policies and rules around international students and confirmed



an understanding of British Council principles. Taking these tests and signing the Code of Conduct is voluntary. More recently, the British Council began offering a training platform to international agents who work, or hope to work, with UK universities.³

The UK government has the power to impose severe sanctions on UK universities, which may include cutting them off entirely from international recruitment. UK Visas and Immigration monitors statistics on study permit applications for each university. UK institutions are acutely aware that the government is monitoring the rate at which students they sponsor are rejected by Border Services when they apply for a study permit.

The UK government has shown a willingness to take punitive action, almost collapsing London Metropolitan University in 2012 by removing its ability to recruit students from outside the European Union. In more extreme cases, the government can take away the existing study permits of students who are already in the country.⁴ Such sanctions have significant ramifications for both international students and the institutions they are enrolled in. In the case of London Metropolitan University, thousands of students had to seek emergency admission to another university or face deportation. There was massive negative publicity both for the institution and the sector.

Australia

Australia's system was mentioned by Ontario stakeholders as a possible model to emulate. The *Education Services for Overseas Students Act 2000* (ESOS) sets out legal rules that colleges and universities admitting students from overseas need to follow (Australian Government, 2024). International student recruitment may be even more economically significant to Australia than it is to Canada, so this legislation is influential. Australian institutions cannot use any recruitment materials that do not bear their Commonwealth Register of Institutions and Courses for Overseas Students code. With respect to agents, institutions are required to have contracts and to “monitor” and “qualify” agents. Universities have staff dedicated to monitoring compliance with ESOS

³ The platform had been running for about four months at the point when HESA met with British Council personnel, and the system was still in a degree of flux.

⁴ Converting this formula to a percentage of tuition for overall years of study might give agents an incentive to recruit students who are likely to complete their programs. However, many agencies have limited liquidity so receiving money later than they do currently could cause them problems.



requirements. In addition to official reporting, institutions engage in informal measures and sector collaboration to ensure compliance, identify any bad actors and mitigate their impact.

As in the UK, Australia’s government monitors the data on how students admitted by a college or university are faring in their applications for admission to the country. This is called the “offshore rejection rate.” If institutional statistics raise concerns, government can issue a sanction, including increases in their “evidence levels,” which are used to determine the amount of paperwork (financial and English-language requirements) required for an applicant to obtain a student visa.

Australia’s immigration system assigns institutions and countries to one of three evidence levels.⁵ Institutions that qualify for the lowest evidence level have streamlined requirements for applicants from all countries. Institutions with higher evidence levels have streamlined requirements only from countries with the lowest evidence levels. The current formula is included in Table 1.

Table 1

Australian Formula for Calculating Institutional and Country Evidence Levels

Evidence	Formula weighting
Rate of visa cancellations	25%
Rate of refusals due to fraud	40%
Rate of refusals excluding fraud	10%
Rate of student visa holders becoming unlawful non-citizens (overstaying visas by more than 28 days)	15%
Rate of subsequent asylum applications	10%

Source: Australian Government Department of Home Affairs (n.d.).

⁵ Countries and institutions each receive an evidence level. The combined levels determine student visa application requirements. Australia does not publish the evidence levels of institutions or countries to reduce the risk of agents targeting particular educational providers. Evidence levels are not an indicator or institutional quality.



Note: This table outlines some of the factors and their respective weightings considered by the Australian government when assigning evidence levels to postsecondary institutions seeking to recruit and enroll international students.

If the weighted average of all indicators is under 1.0, the institution or country is considered Evidence Level 1. Above 2.7 puts them in Level 3. If an institution or country has very small numbers of students, it is assigned a default level until there is enough data. The evidence levels are updated regularly based on changing data.

Receiving a higher evidence level is an unwelcome signal to potential applicants and leads to extra work and potential delays in visa processing, but it does not pose an existential threat. Rather than the single sanction available to government in the UK, this offers less dramatic ways for the Australian government to disincentivize working with agents who provide a poor service.

New Zealand

New Zealand's postsecondary education system is unitary rather than federal, and Education New Zealand and the New Zealand Qualifications Authority (NZQA) play a key role in guiding higher education nationwide. In 2021, the Education (Pastoral Care of Tertiary and International Learners) Code of Practice was put in place to manage international education agents, drawing on two earlier codes that had been in place for many years. The 2021 Code defines agents broadly to include individuals helping to match international students with university accommodation. It requires that:

- education providers have written contracts with any agents working on their behalf; and
- institutions monitor and manage their agents, including checking references.

The degree of monitoring required is not strictly defined. The Code includes regulation, but agents themselves are not directly regulated. Instead, education providers are responsible for ensuring their agents comply and are, theoretically, at risk of losing their ability to enroll international students — either from a specific country or globally — if they are found to be in breach.

At one point Education New Zealand maintained a register of agents, but this has been discontinued. It does offer a range of training resources including information on New Zealand's education system, immigration requirements and rules for international students (Education New Zealand, 2024).



The 2021 Code requires that each college and university provide an “effective complaint system” for international students, which allows students to report bad service received from institution-approved agents. The mechanism for complaints may reflect New Zealand’s broader culture, because it places a great deal of emphasis on non-adversarial mediation. Institutions are required to work with learners to decide, collaboratively, what are reasonable expectations and what processes make sense from a student’s point of view.⁶ Complaints about possible breaches that are not dealt with internally go to the NZQA in the first instance, and providers typically address concerns quickly through dispute resolution. The NZQA has yet to formally declare a breach. As with other regulatory schemes, the application of the Code is seen as helping the marketing of New Zealand as a study destination as well as for the learners themselves.

Conclusion

International education agents play a vital and often positive role in Ontario’s postsecondary education system. However, recent events reflect the perception that there are bad actors among agents, which has contributed to a political climate that has prompted significant intervention from federal authorities and reductions in international student numbers.

Regulating international education agents is a complex and difficult task, not least because many operate outside of Canadian jurisdictions and therefore cannot be sanctioned financially or criminally. Agents may also work independently, without a formal relationship with an institution. Nonetheless, efforts can be made to support reputable, professional agents and mitigate the harm done by unscrupulous ones.

Other jurisdictions offer models of regulation that Canadian jurisdictions should study. The United States relies mostly on sector-based self-regulation. The UK, Australia and New Zealand have non-governmental and arms-length actors that support policy development and regulation in the areas of international education. All three

⁶ Mediation offers several advantages in this context. It allows institutions to offer unconventional settlement terms that might be mutually acceptable, such as scholarships to another college or university in case of a dispute. It also avoids a potential jurisdictional issue faced by international students whose status in New Zealand is tied to enrollment, as pursuing complaints through the courts is not only expensive but can also require physical presence in the country. Mediation can be done remotely, and students are able to have trusted third parties pursue dispute resolution on their behalf.



jurisdictions also have, to varying degrees, the possibility of direct government intervention, usually in the form of restrictions on study permits or an institution's ability to recruit internationally.

The existing models seen in other countries ultimately rely on colleges and universities being held accountable for the behaviour of the agents they authorize to represent them. HESA suggests that institutions may encourage or require agents to undertake training or sign on to codes of practice; with recruitment data linked to student success metrics, agents could also be held accountable for student outcomes. For agents operating independently, institutions could publish the names of unaffiliated agents and assist students in distinguishing between agents who are approved by the college or university and those who are not. Further study would be required to determine if these approaches are effective in mitigating the negative impacts that could result from unscrupulous agents. Further research may yet identify or propose a compelling model for directly regulating private agents who have no relationships with a college or university, especially those based in international jurisdictions

In an industry like international student recruitment that operates in multiple countries, there are hard limits on what any single jurisdiction can do to provide and enforce regulation. With this in mind, it is critical that any system of regulation recognize these limits and work within them to protect international applicants as well as Canada's reputation as a destination for study. This would require close collaboration within the higher education sector and between institutions and all levels of government.



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Appendix A

Canadian Approaches



National Initiatives

The federal government does not have a collective policy on education agents (Packer, 2023), nor is there an accreditation system or formal endorsement of agents at the national level. Instead, oversight is often left to the individual educational institutions and provincial authorities. However, some regulatory efforts do exist at a national level through non-governmental organizations.

The Canadian Bureau for International Education (CBIE) has produced a comprehensive Code of Ethical Practice for its members involved in international education (CBIE, 2013). The Code sets forth ethical principles in key areas such as professional behaviour, student services, recruitment and admissions, study-abroad initiatives, institutional collaborations, and cross-border operations.

The Code requires members to provide accurate information, protect confidentiality and offer appropriate support to international students. It also highlights the importance of transparency in admissions, thoroughness in working with recruitment agents and the promotion of study abroad programs.

Section IV of the Code specifically addresses admissions and recruitment for international students. Its key guidelines focus on maintaining consistent and transparent admissions criteria, ensuring promotional materials are accurate and not misleading and equipping admissions staff with the necessary skills to evaluate foreign credentials. Institutions must provide realistic descriptions of tuition and associated costs, establish clear policies on language proficiency, and exercise due diligence when collaborating with recruitment agents. This diligence involves ensuring that agents possess adequate knowledge to guide prospective students regarding their academic options. These principles aim to uphold ethical standards in the recruitment process, fostering transparency and fairness for international students seeking education in Canada.

Another effort is the International Consultants for Education and Fairs (ICEF) Agency Accreditation Program (ICEF, n.d.). Launched in 2010, it provides quality assurance for international education agencies.



Under ICEF's Code of Conduct (ICEF, 2023) accredited agencies must comply with ICEF's Code of Ethics, which promotes integrity, transparency and the avoidance of deceptive practices in student recruitment. The ICEF accreditation process includes certification for individual agents working within the agency. In addition, the organization also focuses on continuous learning by offering professional development and training for agents to keep them informed about the latest trends in international education, visa regulations and best recruitment practices (ICEF Academy, 2024).

Additionally, Languages Canada and the Canadian Association of Public Schools International jointly provide the Canada Course for Education Agents (ICEF Academy, 2024), which is administered by ICEF and receives support from Universities Canada and Colleges & Institutes Canada. Initially funded by Global Affairs Canada, this course equips education agents with essential insights into Canada as a study destination, covering study options, application processes and student-preparation strategies. Additionally, ICEF maintains a comprehensive list of graduates from the Canada Course, offering accessible, detailed profiles of each agent and their respective education agencies worldwide.

Provincial Regulations

Government of Manitoba Guide to the Code of Practice and Conduct Regulation

The Government of Manitoba's *Guide to the Code of Practice and Conduct Regulation* (Government of Manitoba, 2024) is a comprehensive framework for regulating international education through its International Education Act, making Manitoba the only province in Canada to implement legislation specifically designed to regulate international education agents. The Guide was developed collaboratively between the Manitoba government's International Education Act Working Group and Designated Education Providers with the purpose of enhancing Manitoba's reputation as a destination for international education by mitigating risks associated with misleading recruitment practices and supporting student success.

Consultation with the Manitoba Council of International Education highlighted that the Guide operates by focusing on a number of key areas such as ethical recruitment



practices, transparent communication and contractual obligations, protection of student rights and wellbeing and compliance with Manitoba’s legal and educational standards.

The *Guide* establishes explicit ethical requirements for agents, particularly emphasizing transparency in the recruitment process. It mandates that agents provide accurate and clear information regarding course offerings, fees and the living conditions students can expect in Manitoba. By establishing this baseline, the *Guide* protects students from fraudulent or misleading information.

A notable feature of this document is its focus on safeguarding international student rights. It holds both agents and educational institutions accountable for ensuring that international students are treated fairly and have access to support services, including academic, housing and legal assistance, if needed.

The *Guide* further requires agents to maintain accurate records of their activities and interactions with students and institutions. This creates a transparency mechanism that institutions and government bodies can use to monitor agent behaviour, ensuring that students are treated ethically.

While the *Guide* outlines standards for education agents, it lacks specificity in terms of enforcement mechanisms. In addition, the International Education Act cannot affect agents outside the province or country, thus limiting the sanction of agents only if they are licensed or registered in Manitoba.

British Columbia Ministry of Post-Secondary Education and Future Skills’ Education Quality Assurance Code of Practice

The British Columbia Ministry of Post-Secondary Education and Future Skills has developed a new Code of Practice (Government of British Columbia, 2024a) designed to protect and support international students. In tandem with the Code, they have revised their Education Quality Assurance (EQA) Policy and Procedure Manual (Government of British Columbia, 2024b), which were be launched concurrently. Institutions are required to verify they meet the standards set out in the Code.



In 2009, British Columbia introduced the EQA certification seal to tighten their quality requirements for higher education institutions. Institutions with the EQA⁷ brand are “recommended to Immigration, Refugee and Citizenship Canada (IRCC) for inclusion on IRCC’s Designated Learning Institution (DLI) list for British Columbia.” One of the three key purposes of the Code is to establish standards for institutions that are utilizing education agents.

The Code outlines that institutions must monitor and manage their education agents effectively by conducting reference checks and ensuring compliance with ethical standards through written agreements. In addition, it prohibits institutions from accepting students through agents who provide unauthorized immigration advice or engage in dishonest recruitment practices such as misinformation. Furthermore, the institution must provide the EQA unit of the Ministry with complete, accurate and timely information regarding its agents, including agent-review processes and quality assessments, upon request.

Although the Code establishes standards and practices for regulation, it does not directly regulate the agents, rather EQA-designated institutions must take responsibility for the agents working on their behalf. Non-compliance with these standards can result in the loss of their EQA designation.

Saskatchewan Ministry of Education’s Agent Training Program

The Saskatchewan Ministry of Advanced Education launched the Saskatchewan Agent Training Program in 2022 to equip international recruitment agents with the skills needed to deliver high-quality services to prospective students (Government of Saskatchewan 2024). The Saskatchewan Agent Training Program is strategically aligned with the province's objectives for economic recovery and population growth. By enhancing the international education strategy, the program is focused on boosting international student enrollment rather than regulating agents.

⁷ EQA designation is not required for institutions hosting international students (who do not require study permits) for six months or less.



This program, delivered by CBIE, enhances agents' knowledge so they can effectively support and inform students considering Saskatchewan as their postsecondary education destination.

EduNova's Agent-training Program in Partnership with CBIE

EduNova, Nova Scotia's co-operative association of education providers — the only one of its kind in Canada — developed their Agent Training Program in partnership with the CBIE in 2022. The program is specifically targeted at agents working with Nova Scotia's 11 postsecondary institutions, with the primary objectives of decreasing study permit rejection rates and increasing international student enrollment in the province. The free training program is focused solely on training individual agents rather than agent aggregators (EduNova 2024).

For its pilot program, EduNova established a selection committee, comprised of EduNova members, to select and nominate 30 agents to go through the training program. Conversation with EduNova highlighted that the committee, along with CBIE, conducted a gap analysis and matrix model to develop modules for the training program. Currently, the Agent Training Program has four modules and is delivered online through self-paced courses by CBIE, allowing for flexible participation. The module topics include:

- Module 1: Overview of the Province/Region
- Module 2: Foundational Aspects of Immigration Law in Canada
- Module 3: What Goes into a Successful Application?
- Module 4: Application and Practice Through Case Studies

In addition to completing the online courses, agents tour Nova Scotian institutions to better understand the postsecondary education choices within the province. Currently, there is no obligation for the agents to be in Nova Scotia for the training as it is provided online through synchronous and asynchronous methods.

Agents go through two levels of certification, and certified agents in Level 1 and Level 2 are listed on EduNova's website. Currently, there are three lists: Nova Scotia Level 1



certified agents; Atlantic Canada Level 1 certified agents; and Atlantic Canada Level 2 certified agents. Upon completion, agents receive a certification from CBIE and attend a graduation ceremony in Nova Scotia.

EduNova draws its success from a small, tight-knit community. Information sharing among institutions, community members and alumni groups plays a key role in identifying any bad actors and making the system efficient. Most of the agents that work with institutions in Nova Scotia are alumni who are invested in improving the international student experience. Due to the success of Nova Scotia agents, EduNova's training program now covers agents operating in Atlantic provinces. It has also led to expansion of training programs to Francophone agents operating in the province.

HESA's consultation with EduNova revealed that universities have reported better communication with agents who have gone through the training program leading to more communication channels between institutions and agents. This has further led to agents finding "better fit" or "right fit" for students by understanding the 11 postsecondary institutions in Nova Scotia, their institutional and local culture and lifestyle.

Ontario Public Colleges' Standards of Practice for International Education

Colleges Ontario's (2023) Standards of Practice for International Education, released in March 2023, establishes minimum standards for international student activities across Ontario's public colleges. The standards cover crucial areas like student focus, professionalism, transparency, cultural sensitivity and accountability. This holistic approach addresses multiple facets of international education.

One of the key areas is the management of agents. This helps ensure ethical practices and protects students from potential misinformation. It further mandates the agents to complete an Ontario college-sector-endorsed training program to maintain quality and consistency in student-recruitment practices across the province.

